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6 *Attorneys for Defendants*
7 Romeo Aranas, Beebe Clark, James Cox, James Dzurenda,
Leilani Flores, Jo Gentry and Dwight Neven

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 ELIZABETH CARLEY,

11 Plaintiff,

12 v.

13 WARDEN NEVEN, et al.,

14 Defendants.

Case No. 2:17-cv-02346-MMD-CLB

15 **STIPULATION FOR EXTENSION OF TIME**
TO FILE DISPOSITIVE MOTIONS
(First Request)

16 Plaintiff, Elizabeth Carley, by and through counsel, Lisa A. Rasmussen, and Defendants, Romeo
17 Aranas, Beebe Clark, James Cox, James Dzurenda, Leilani Flores, Jo Gentry and Dwight Neven, by and
18 through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior
19 Deputy Attorney General, hereby stipulate to extend the deadline to file dispositive motions to November
20 30, 2021. The Court, in ECF 45, established that dispositive motions were to be filed by October 31,
2021. October 31, 2021 was a Sunday.

21 Counsel for the Defendants has recently completed a jury trial in Lovelock state court, and has
22 been involved in preparation for a global settlement conference in this Court. Therefore, the dispositive
23 motion, in this matter, has not been completed. Counsel for the Defendants requests additional time to
24 complete the motion.

25 On November 1, 2021, Counsel for Plaintiff and Counsel for the Defendants had a telephonic
26 conference in which the extension was agreed upon. Accordingly, the parties hereby stipulate to extend
27 the deadline to file dispositive motions from November 1, 2021 to **November 30, 2021**. The parties
28 respectfully request the Court grant the request, and extend the deadline.

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3 DATED this 2nd day of November, 2021

4 LISA A. RASMUSSEN, ESQ.
5 Law Offices of Kristina Wildevelde & Assoc.

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7 By: /s/ Lisa A. Rasmussen
8 LISA A. RASMUSSEN, Bar No. 7491
9 Attorney for Plaintiff

DATED this 2nd day of November, 2021

AARON D. FORD
Attorney General

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11 By: /s/ Douglas R. Rands
12 DOUGLAS R. RANDS, Bar No. 3572
13 Senior Deputy Attorney General
14 Attorneys for Defendants

15 IT IS SO ORDERED.

16 Dated: November 2, 2021.

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20 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 2nd day of November, 2021, I caused to be deposited for mailing, a true and correct copy of the foregoing, **STIPULATION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS**, to the following:

Lisa A. Rasmussen, Esq.
The Law Offices of Kristina Wildeveld & Associates
550 E. Charleston Blvd., Suite A
Las Vegas, NV 89104
lisa@veldlaw.com

/s/ Roberta W. Bibee
An employee of the Office of the
Nevada Attorney General